

Hearing Date: May 14, 2013 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: April 30, 2013 at 4:00 p.m. (prevailing Eastern Time)

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*Special Counsel for Wilmington Trust, National
Association, as Indenture Trustee for the Senior
Unsecured Notes Issued by Residential Capital, LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	
	:	Chapter 11 Case No.
RESIDENTIAL CAPITAL, LLC, <u>et al.</u>,	:	
	:	12-12020 (MG)
Debtors.	:	
	:	(Jointly Administered)
	:	
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**CORRECTED NOTICE OF MOTION OF WILMINGTON TRUST, NATIONAL
ASSOCIATION, SOLELY IN ITS CAPACITY AS INDENTURE TRUSTEE FOR THE
SENIOR UNSECURED NOTES ISSUED BY RESIDENTIAL CAPITAL, LLC FOR AN
ORDER AUTHORIZING IT TO PROSECUTE CLAIMS AND OTHER CAUSES
OF ACTION ON BEHALF OF THE RESIDENTIAL CAPITAL, LLC ESTATE**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On April 19, 2013, Wilmington Trust, National Association (the "Trustee"), solely in its capacity as indenture trustee for various series of senior unsecured notes (the "Notes," and the holders thereof, the "Noteholders") issued by Residential Capital, LLC ("Residential Capital," and with its debtor-affiliates, the "Debtors") filed its Motion for an Order Authorizing it to Prosecute

Claims and Other Causes of Action on Behalf of the Residential Capital, LLC Estate (the “Motion”).

2. A hearing (the “Hearing”) to consider the Motion shall be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 501 of the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York, 10004, on May 14, 2013 at 10:00 am (prevailing Eastern Time).

3. Any objections to the Motion must be made in writing (an “Objection”), filed with the Court (with a copy to Chambers) and served in accordance with the Order Under Bankruptcy Code Sections 102(1), 105(a) and 105(d), Bankruptcy Rules 1015(c), 2002(m) and 9007 and Local Bankruptcy Rule 2002-2 Establishing Certain Notice, Case Management and Administrative Procedures (Doc. 141) (the “Case Management Order”), and served upon the Special Service List, as that term is defined in the Case Management Order, so as to be actually received no later than **April 30, 2013** at 4:00 pm (prevailing Eastern Time) (the “Objection Deadline”).

4. If no objections to the Motion are timely filed and served on or before the Objection Deadline, the Trustee may submit to the Bankruptcy Court an order substantially in the form of the proposed order attached to the Motion as Exhibit A.

5. A Copy of the Motion can be obtained or viewed for a fee via PACER at www.pacer.gov or (without charge) on the Debtors’ restructuring website at www.kcellc.net/rescap.

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Dated: New York, New York
April 24, 2013

CLEARY GOTTlieb STEEN & HAMILTON LLP

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